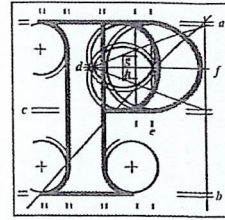


**Our Case Number:** ABP-316272-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Eamon Kelly  
107 Terenure Road West  
Terenure  
Dublin 6W  
D6W DY07

**Date:** 22 August 2023

**Re:** Bus Connects Templeogue/Rathfarnham to City Centre Core Bus Corridor Scheme  
Templeogue/Rathfarnham to City Centre

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

It is noted that your submission includes an objection to the compulsory purchase. Please be advised that objections to this CPO may only be made by those listed on the CPO schedule. Accordingly, as you are not listed on the schedule, your objection to the CPO cannot be considered.

If you have any queries in relation to this matter, please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

HA02A

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Terenure  
Dublin 6w  
D6W DY07

An Bord Pleanála (Strategic Infrastructure Division)  
64 Marlborough Street  
Dublin 1  
D01 V902

15 August 2023

**RE: Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme (Planning Application and Compulsory Purchase Order 2023)**

I am writing to make formal objections to the planning application in respect of the Templeogue / Rathfarnham to City Centre Core Bus Corridor Scheme.

I am writing as local resident profoundly affected by the planning application. Also, while I am not directly affected by the proposed CPO, I am concerned at the scale of the CPO proposed, at the lack of planning that underpins it, and at the fact that an Bord Pleanála is being asked to approve a CPO for a scheme that has not yet achieved planning permission.

I would note that I have extensive experience in infrastructure projects and the planning procedures associated with them. It is my view, based on my extensive professional experience, that the consultation process here has been exceptionally poor and extremely confusing.

Additionally, I would note that it is highly abnormal for approval of a Compulsory Purchase Order to come before the relevant planning authority in the absence of approved planning permission. The application before an Bord Pleanála for approval of a CPO is both surprising and disappointing.

In particular, I object to the inclusion in the CPO of properties between Beaumont House and St. Joseph's Church which is both unnecessary in that the existing width of the road can accommodate BusConnects Signal Controlled Priority between Beaumont House and Rathgar village; and damaging to the local community in routing additional heavy bus and cycle traffic past both a primary school and church with significant daily footfall of older and very young pedestrians. Given Signal Controlled Priority lends itself to buses accelerating to progress into the single lane, I would strongly advocate a common sense safety-led approach that this juncture is placed further from the church and school in Terenure village.

In addition to the above, my primary objections are as follows:

- 1) The proposed scheme is not fit for purpose, and alternatives have not been fully or properly assessed
- 2) The design of the Bus Corridor Scheme will have wide-ranging negative impacts for local communities
- 3) A full and proper public consultation process has not been conducted

Regards,  
Eamon Kelly

- 1) The proposed scheme is not fit for purpose, and alternatives have not been fully or properly assessed
  - a. The proposed scheme has not adequately taken into account alternative forms of transport i.e. light rail, metro, technological improvements such as smart bus lanes. The scheme as proposed is a sticking plaster that does not provide a solution beyond the very short term. It cannot possibly be viewed as a “strategic” initiative
    - i. It is incredibly disappointing that no indepth assessment or proper consultation has been undertaken on alternatives such as a metro system feeding Harold’s Cross, Terenure, Rathgar and Tallaght. This scheme is really tinkering at the edges of a fundamental deficit in Dublin’s transport infrastructure that can very clearly only be solved with a metro system
    - ii. The analogy with development of the country’s motorways is an obvious recent example where undertaking an ambitious capital investment programme, and creating a new long-term asset for the country, has had a transformative positive impact for the population. The NTA’s lack of ambition in ruling out even an assessment of a metro programme for Dublin until 2042 reflects very poorly, and significantly dilutes the credibility of the BusConnects plans in general – and the Templeogue / Rathfarnham to City Centre Bus Corridor Scheme in particular
  - b. The improvements contemplated by the scheme are very marginal (i.e. 7-8 minute improvements on journey times) and do not merit such damaging / impactful measures to be taken on local communities
    - i. The improvements contemplated could easily be achieved through simple steps such as cashless payments, but this has not been tested: this plan is being progressed without first seeing the impacts of other elements of the plan e.g. reducing the number of bus stops and introducing cashless payments
  - c. The proposed scheme has not taken been amended to take into account the profound changes to work & travel patterns resulting from the Covid-19 pandemic
  - d. The NTA’s Signal Controlled Priority Plans are insufficiently developed, with no alternatives explored to CPO of large numbers of properties i.e. smart bus lanes which flow different directions depending on time of day (as successfully implemented internationally), or different placements of the Signal Controlled Priority dual to single lane “merger zone”
    - i. As noted above, the movement of the “merger zone” (from dual-lane to single-lane) further towards St. Joseph’s Church and Boys’ National School, is highly concerning from a safety perspective. It is natural to assume that buses, once given the priority “go-ahead” signal, will accelerate into the single lane of traffic. This presents obvious dangers closer to the village where many older and younger pedestrians cross the road coming from / going to either the church or the school. It would be far more sensible to place the “merger zone” further towards the middle of Terenure Road East. This would also have the advantage of removing properties between St. Joseph’s Church and Brighton Road from CPO
- 2) A full and proper public consultation process has not been conducted
  - a. Residents did not have sufficient opportunity to engage with the consultation process, which was conducted almost entirely through the Covid-19 pandemic (and always coinciding with peaks in numbers of cases)
  - b. The public consultation process has been extremely poorly managed, unnecessarily confusing, and inaccessible, with a number of corridors out for consultation at any given point in time

- 3) The design of the Bus Corridor Scheme will have wide-ranging negative impacts for local communities
  - a. The proposed bus routes and new turns introduced for buses, taxis and cyclists will result in an increased bottleneck in Terenure village and result in long tailbacks on feeder roads such as Terenure Road West
  - b. Widening of local roads will result in the destruction of a large number of mature trees and period features of built structures locally
  - c. Local businesses will suffer profoundly by Terenure village becoming a thoroughfare for buses, with no parking available for business reliant on footfall
  - d. These negative impacts will not be reversed in the future even when some form of rail system is inevitably built in the area